

To: The Federal Communication Commission
Washington, DC

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

My name is Lee Nettles and I am writing in response to your request for comments in the "Further Notice of Proposed Rule Making", MM Docket No. 95-176, FCC 98-3" released January 14, 1998.

[Paragraph 4-8] Why I feel open caption for emergency situations is important in community and local programming. In 1980's there was a train derailment in my town, Greenfield, MA. Evacuation was necessary due to a chemical leak from one of the train's car. One deaf grandmother in her 40's was not aware that this have happen across the street from her apartment. She was busy doing things and watching TV. She saw a special bulletin word on screen but no indication of what it was about or its location. She ignored it and waited for her program to come back on. Police have warned all residents nearby and when police came to her door asking her to get out she left with no understanding why everyone was out of her apartment complex. She at first assumed that there was something wrong with inside her apt complex like maybe gads pipe broke and for safety everyone was taken out. Once she was on the road she saw a lot of cops and cars giving directions and communicating with drivers, she then realized there was something wrong larger than her apt complex. Assuming it could be a nuclear emergency since we had two nuclear power plants nearby Rowe Yankee operating since 1959 as well as Vermont Yankee since 1973. (Greenfield is in federal's NRC 10 mile zone evacuation plan.) Her first thought was her grandchildren in school and attempted to pick them up. A Police officer told her to move on as she tried to write a note, he ignored her. She stopped at nearby bar which have a TV to try to get a picture of what was going on. Since she cannot hear the car radio. After a few moments of trying to get information from people at the bar she got frustrated and drove half an hour south to her hearing friends home. They try to help her to find out what was happening through radio and TV. Finally, she was told that she could pick up children and when she arrived they were not there. She tried not to panic and tried to find ways to locate them and was able to pick them up after some written communication with school staff.

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These course of events was very stressful. She was more stressed than average people who have better access to information. These would not be necessary, if TV programming was captioned as part of emergency broadcasting.

In another occasion I experience the following in Springfield MA. One day a drunk driver going the wrong way on Interstate 91 hit a truck trailer carrying unburned fuel, uranium going to a nuclear facility in Vermont to be used as nuclear fuel to generate electric power. The truck caught on fire and its load burned in the middle of the city. Firefighters couldn't put water on it because it would contaminate the Conn. River next to it. At first there was the possibility of radiation until it was discovered that it was not dangerous. It was decided to let it burn out itself which lasted 24 hours. I happen to work 4 blocks away all day not aware of what was happening. When I turn on the local news there was a picture of a burning truck at that location. I was shocked when I read the newspaper the next day and realized the gravity of the situation!

Another major event in Springfield not long ago was a main water pipe break in downtown next to the river very early in the morning. The broken pipe swallow the road and vehicles into the hold. There was water contamination. The waster flooded the roads and washed down to the river mixing the water and making it undrinkable. The local TV news announced the break and advised citizens not to drink water. Many deaf already brushed their teeth, took a shower and drink water before going to work or doing activities. Many deaf got paranoid, how safe was the water and how dangerous. Will they got sick, will they die? It was hours before they could get information form local TV assuring deaf people of safety rules. Is that fair? TV stations should provide 100 percent closed caption at all times no mater. There is too much room for error if its not 100 percent captioning.

[Paragraph 9] We recognize there is very limited number of skilled real time captioners locally and nationwide. We know how valuable these services needed for the best interest and fairness in accessibility now and later years, we need FCC to recruit and train proper number of applicants and certify individual as skilled captioners by FCC for employment at a very minimum or no cost to the applicant. The proposed training program must last until FCC and NAD (National

Association of the Deaf) has determine there is sufficient number of trained/certificate captioners in order to eliminate the skilled labor shortage around the USA and its territories.

[Paragraph 10-11] We were told by our local TV station in Springfield, MA area that they can call and hook up the real time captioner over the phone and broadcast using that system. They are recluanted to use it because of the cost. I cannot say its because of not enough pool of captioner is the primary reason for not having it as it was not concern for them. We require for ruling that they are required to obtain one over the phone system providing they find as soon as possible and with assistance with FEMA (Federal Emergency Management Administration) and/or FCC's EAS (Emergency Alert System) and/or each state's Civil Defense data pool, within a time frame from the intitate of emergency situation and the programming of emergency to public. We request that FCC and FEMA coordinate the list of captioners certificate volunteering on list all over the country, and coordinate with particular TV stations in achieving the needs be met. This temporary coordinating should be established by FCC's EAS and be done until there are sufficient pool of captioners to compete for employment without being hardship to the TV stations or Cable or Satellite and to the public.

[Paragraph 12] See comments regarding to Paragraph 4-8 above. In cable or satellite access, the city or town or county or state government officer at higher ranking should have access to intitate the emergency captioning at a proper timing to have it open-captioned on TV screens in many homes within the assigned district or area that can be feasible through programming using post office area codes, or summon up from cable or satellite records of on line contract with consumers using the specific location to be matched up with government access, i.e. if the emergency occurs within the Town of Greenfield, then the town manager or police chief can access to TV programming and override the programming in limited way not to give hardship to viewers or consumers at the same time giving open captioned for a period of time necessary until emergency situations has been uplifted. The town can control the district by using zip code on where to caption per sec depending on the agreement in fairness between cable and/or satellite companies and the Town or the state Emergency Management Office or similar agencies elected to oversee accessible programming and communications between the government and the cable

and satellite operators. Another possibility is making sure that every town area who has contract with satellite/cable companies be including equipment connected to ANSI regulated or similar codes, open computer port be accessible in case a independent captioner can hook up his/her equipment to the main cable system to broadcast real-time caption for emergencies and non-emergencies, i.e. town meetings, television broadcast of candidate officers or elected officers over cable system.

[Paragraph 13] The money should not be consider a factor in limiting the emergency information programming closed captioning. We have waited for a long time for the technology making closed captioning available and now is the time at any cost. Small television stations and small cable operators should be funded the cost of real-time caption from their main assigned station headquarters, i.e. NBC, ABC, CBS, FOX, CNN.

In conclusion I feel that closed caption is a vital need in local television, movies and sports in emergency and non-emergency situations.

Respectfully Submitted,



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